

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

SERVICIOS FUNERARIOS GG, S.A. DE C.V.,

Case No. 23-cv-10684

Plaintiff/Counter-Defendant,

v.

ADVENT INTERNATIONAL CORPORATION,

Defendant/Counter-Plaintiff.

/

**SERVICIOS FUNERARIOS' GG, S.A. DE C.V.'S MOTION TO SEAL PORTIONS OF
AND EXHIBITS TO MEMORANDUM IN SUPPORT OF RULE 11 MOTION FOR
SANCTIONS AGAINST ADVENT INTERNATIONAL CORPORATION
AND ITS COUNSEL**

Plaintiff Servicios Funerarios GG, S.A. de C.V. ("SF") brings this assented to motion to seal (1) portions of SF's Memorandum in Support of its Rule 11 Motion for Sanctions Against Advent International Corporation ("AIC") and its Counsel (Doc. 338) (the "Memorandum") and (2) the exhibits marked as Confidential and Highly Confidential that are attached to the Sires Declaration in Support of the Rule 11 Motion (Docs. 337-1, 337-3).

SF has designated Exhibit A as "Confidential" because it contains information the disclosure of which would contravene an obligation of confidentiality to a third Person or to a court and information that relates to sensitive business, financial, or commercial information that is not publicly available, that provides a commercial advantage to its possessor, that contains sensitive or personally identifiable information of a natural person, and/or that the disclosure of which to persons

other than those described in the Protective Order (Doc. 267 at ¶ 4) would create a risk of harm that could not be avoided by less restrictive means. The amended Protective Order (Doc. 267) requires that documents marked as “Confidential” and “Highly Confidential” be submitted to the Court under seal.

Further, AIC has designated Exhibit C “Confidential.” Pursuant to (Doc. 267 § 8,) SF conferred with AIC regarding whether it consented to de-designate the confidentiality of Exhibit C and the portions thereof referenced in the Memorandum. AIC replied that it maintained the confidentiality designation of the documents. As AIC is the party that designated the document as “Confidential,” AIC is in the best position to provide a substantive basis for sealing the unredacted version of the Memorandum and Exhibit C thereto.

Similarly, portions of SF’s Memorandum reference the foregoing Exhibits designated as Confidential and/or Highly Confidential by the parties.

WHEREFORE, SF asks this Court to seal the redacted portions of the document entered as (Doc. 338) and to seal the documents entered as (Docs. 337-1, 337-3.)

Dated: April 22, 2024

Respectfully submitted,

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LOCAL RULE 7.1 CERTIFICATION

I certify pursuant to Local Rule 7.1, that counsel to Plaintiff and Counterclaim-Defendant Servicios Funerarios GG, S.A. de C.V. conferred with counsel for Defendant and Counterclaim-Plaintiff Advent International Corporation concerning the issues presented in this Motion on April 18, 2024.

By:/s/ *Carlos M. Sires*

Carlos M. Sires

CERTIFICATE OF SERVICE

I, Carlos Sires, hereby certify that the above was filed through the ECF system and that I have caused a true and correct copy of the above to be served on Plaintiff's counsel.

Date: April 22, 2024

By:/s/ *Carlos M. Sires*

Carlos M. Sires